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11 *Attorneys for Plaintiffs*
12

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15

16 MARGARITO T. LOPEZ individually
and as successor in interest to Margarito
17 E. Lopez, Deceased; SONIA TORRES,
KENI LOPEZ, and ROSY LOPEZ,
18 individually,

19 Plaintiffs,

20 vs.

21 CITY OF LOS ANGELES; JOSE
ZAVALA; JULIO QUINTANILLA; and
22 DOES 1-10, inclusive,

23 Defendants.
24

Case No.: 2:22-cv-07534-FLA-MAAx
Hon. Judge Fernando L. Aenlle-Rocha,
Hon. Mag. Maria A. Audero

**JOINT STIPULATION TO
CONTINUE THE SETTLEMENT
COMPLETION CUTOFF DATE**

FPTC: May 31, 2024
Trial: July 16, 2024

25 **TO THIS HONORABLE COURT:**

26 Plaintiffs MARGARITO T. LOPEZ individually and as successor in interest to
27 Margarito E. Lopez, Deceased, SONIA TORRES, KENI LOPEZ, and ROSY

1 LOPEZ, individually (“Plaintiffs”), and Defendants City of Los Angeles, Julio
2 Quintanilla, and Jose Zavala, (“Defendants”) (collectively “the Parties”) through
3 their respective counsel of record, do hereby stipulate and request to modify the
4 Court’s Scheduling Order (Doc. 27) as follows:

5
6 **RECITALS**

7 WHEREAS, The Parties have been working diligently to complete expert
8 discovery.

9 WHEREAS, due to the trial schedules of counsel and the availability of the
10 mutually-agreed upon ADR Panel mediator, Mr. Richard Copeland, the Parties are
11 unable to find a date convenient for all Parties and for Mr. Copeland for the
12 mediation in this case prior to the current Settlement Completion Cutoff date of
13 April 26, 2024.

14 WHEREAS, all Parties and Mr. Copeland are available on and have
15 scheduled a mediation for this case for May 7, 2024 at 10:00 a.m.

16 WHEREAS, there have been two previous requests for the continuance of
17 previous deadlines, but no request for a continuance of the Settlement Completion
18 Cutoff or the trial date;

19 WHEREAS, the brief continuance of the Settlement Completion Cutoff date
20 will not affect any other dates in this case;

21 WHEREAS, there is no prejudice to any party if the current deadline set in
22 the Scheduling Order is extended;

23 WHEREAS, good cause can be shown based on the Parties’ scheduling of
24 the mediation with Mr. Copeland for May 7, 2024;

25 WHEREAS, the Parties therefore respectfully request the Court continue the
26 current Settlement Completion Cutoff date from April 26, 2024 to May 10, 2024.

27 The Parties will file a post-settlement conference status report with the Court

1 within 24 hours after the mediation to advise the Court as to the outcome of the
2 mediation.

3 Respectfully submitted,

4
5 DATED: March 26, 2024

LAW OFFICES OF DALE K. GALIPO

6
7 By /s/ Dale K. Galipo

8 Dale K. Galipo
9 Renee V. Masgonsong
Shannon J. Leap¹
Attorneys for Plaintiffs

10 DATED: March 26, 2024

CARRILLO LAW FIRM, LLP

11
12 By /s/ Michael Carrillo

13 Luis A. Carrillo
14 Michael Carrillo
Attorneys for Plaintiffs

15 DATED: March 26, 2024

16 LOS ANGELES CITY ATTORNEY'S OFFICE
17 HYDEE FELDSTEIN SOTO, City Attorney
18 DENISE C. MILLS, Chief Deputy City Attorney
19 SCOTT MARCUS, Chief Asst. City Attorney
20 CORY M. BRENT, Senior Assistant City
21 Attorney

22 By /s/ Ty A. Ford

23 TY A. FORD, Deputy City Attorney
24 Attorneys for Defendant CITY OF LOS
25 ANGELES

26 Date: March 27, 2024

STONE BUSAILAH, LLP

27 By: /s/ Muna Busailah

MUNA BUSAILAH, Esq.
Attorney for Defendants JOSE ZAVALA,
JULIO QUINTANILLA

¹ As the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.